

Sir or Madam,

I receive an average of eight to ten telemarketing calls per week. On certain days, I receive up to five within several hours' time. Pre-recorded calls are a substantial minority of these calls.

I was impressed when I discovered the TCPA, and the protections the law offered. However, I have several suggestions for improvement.

First, for-profit marketers are using the non-profit exception to conceal violations of the TCPA. When you begin the national DNC list, please, do not allow an exception for non-profits; for live or pre-recorded calls.

Second, many marketers are avoiding liability by failing to properly identify the caller. Please, add rules requiring identification of the caller, the entity calling, and the party on whose behalf the call is made. Further, consumers need a more reliable way to identify a caller by caller ID. Often, marketers either block or forge a caller ID number. Please add a rule mandating that marketers disclose the actual phone number they call from, through the caller ID device.

Third, please make more clear in the rules that a right of action exists against both the caller and against the entity on whose behalf the call was made. For example, if marketing company "A" calls on behalf of multiple clients, a second call to a consumer from "A" even if on behalf of a different client should be a violation. Also, two calls on behalf of the same client, even if by different marketing companies, should be compensable.

Thank you,

Gregory S. Reichenbach